ARDC No. 6276278

3007042-MJM/CMK

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

THOMAS LAYBURN and CINDY LAYBURN,	FILED: MAY 16,2008 08CV2876 NF JUDGE ANDERSEN
Plaintiffs,	MAGISTRATE JUDGE SCHENKIER
vs.	No
HYD MEC GROUP LIMITED,	
Defendant.	

NOTICE OF REMOVAL TO FEDERAL COURT

NOW COMES the Defendant, HYD-MECH GROUP LIMITED, by and through its attorneys, SmithAmundsen LLC, and pursuant to 28 USC §§ 1332, 1441 and 1446, removes this action to the United States District Court for the Northern District of Illinois, Eastern Division, and in support thereof, states as follows:

- 1. The Movant's Notice of Removal is based upon subject matter jurisdiction conferred by diversity of citizenship, as established in 28 U.S.C. § 1332.
- 2. In her Complaint filed in the Circuit Court of Cook County, Illinois, Plaintiff alleges that the action stems from a slip and fall occurring at 7000 Mannheim Road, Rosemont, Illinois on November 3, 2007.
- 3. This action is removable to the United States District Court for the Northern District of Illinois pursuant to 28 U.S.C. §1441, which provides that any civil action brought in a state court of which the district courts of the United States have original jurisdiction,

may be removed by the Defendants to the district court of the United States for the district and division embracing the place where such action is pending.

- 4. Complete diversity exists between the parties in this case, as detailed in HYD-MECH GROUP LIMITED's Memorandum of Law in Support of Defendant HYD-MECH GROUP LIMITED's Notice of Removal to Federal Court filed concurrently herewith.
- 5. This Notice of Removal is filed timely within 30 days after HYD-MECH GROUP LIMITED was served in compliance with 28 U.S.C. Section 1446(b).
- 6. Defendant has attached hereto as Exhibit "A", copies of the complaint, evidence of process, motions, and orders served upon it in this action. No other processes, pleadings or orders, other than the documents attached hereto, have been served upon or delivered to Defendant. The attached documents do not evidence intent to litigate this matter in state court.
- 7. In Support of this Notice of Removal, Defendant has submitted a Memorandum of Law in Support of Removal, attached hereto.

WHEREFORE, Defendant, HYD-MECH GROUP LIMITED, prays that this Honorable Court retain jurisdiction of the matter pursuant to 28 U.S.C. §§ 1332, 1441 and 1446.

Respectfully Submitted,

SMITHAMUNDSEN LLC

/s/ Camille M. Knight
Attorney for Defendant
HYD-MECH GROUP LIMITED

Michael J. McGowan Camille M. Knight SmithAmundsen LLC 150 North Michigan Avenue, Suite 3300 Chicago, IL 60601 (312) 894-3200 IL ARDC No. 6276278

CERTIFICATE OF SERVICE

I, Camille M. Knight, hereby certify that on the 19^{th} day of May, 2008, I electronically filed the foregoing Notice of Removal to Federal Court, with the Clerk of the Court using the CM/ECF system. A copy of the foregoing has also been sent via first class mail to:

Robert J. Adelman Levin Riback Law Group 200 North LaSalle Street, #2300 Chicago, IL 60601

/s	/Camille M.	Knight	

SEL/DCM/kkm	07-201	•	04/09/08	#21	683
STATE OF ILLINOIS)				
•) SS.				
COUNTY OF COOK)				
IN THE CIRC	CUIT COU NTY DEPA	RT RT	OF COOK MENT, LA	COUNT W DIVI	Y, ILLINOIS SION
THOMAS LAYBURN a	nd)		
CINDY LAYBURN,)		÷.*
	intiffs,)	•	
₩.	·) C	ase No.	ZOOBLOO3888 CALENDAR/ROOM B TIME OO:00
HYD-MEC GROUP LIN	MITED,		\(\)		Product Liability
	_)	:	
. Def	fendant.)		

COMPLAINT AT LAW

COUNT I - STRICT LIABILITY IN TORT - HYD-MEC GROUP LIMITED

NOW COMES the plaintiff hereto, THOMAS LAYBURN, by and through his attorneys SUSAN E. LOGGANS & ASSOCIATES, P.C., complaining of the defendant HYD-MEC GROUP LIMITED, a Canadian corporation, upon information and belief states as follows:

- On and prior to November 21, 2007, defendant HYD-MEC GROUP 1. LIMITED was a corporation authorized to transact business in the State of Illinois and specializes in manufacturing and servicing large sawing machines.
- On and prior to November 21, 2007, defendant HYD-MEC GROUP 2. LIMITED did design, manufacture, sell, distribute and maintain specialty steel cutters.
- On November 21, 2007, one of the steel cutting machines designed, 3. manufactured, distributed, maintained and/or sold by the defendant HYD-MEC



Apr 21 08 03:32p

Centers (CSC), in the City of Romeoville, County of Will, State of Illinois.

- 4. On and prior to November 21, 2007, the plaintiff, THOMAS

 LAYBURN, was an employee of CSC, and was required to cut large and small diameters into steel plates using the HYD-MEC H-22A. CSC bought the HYD-MEC H-22A steel cutter used by the plaintiff directly from HYD-MEC Group Limited.
- 5. On November 21, 2007, while the plaintiff THOMAS LAYBURN was in the normal course of his duties and was utilizing the aforesaid HYD-MEC H-22A, he was injured.
- 6. Prior to November 21, 2007, at the time the HYD-MEC H-22A left the control of defendant HYD-MEC GROUP LIMITED, it was in a condition that was unreasonably dangerous in one or more of the following ways:
 - (a) Had insufficient safeguards to prevent users of the HYD-MEC H-22A from turning the switch to the "Close" position for the vise.
 - (b) Did not contain appropriate mechanisms to prevent the switch from automatically shutting when the switch is turned to the "Close" position, causing the vise to instantly shut, when feasible, alternative designs were available.
 - (c) Did not contain appropriate warning signs and instructions for the safe operation and use of the HYD-MEC H-22A; and
 - (d) Did not contain appropriate mechanisms for stopping the vice when the switch was in the "Close" position as it did for when the switch is in the "Open" position.

As a proximate result of one or more of the aforesaid unreasonably 7. dangerous conditions of the aforesaid HYD-MEC H-22A, the plaintiff, THOMAS LAYBURN, suffered severe and permanent injury of a personal and pecuniary nature.

WHEREFORE the plaintiff, THOMAS LAYBURN, prays that judgment be entered in his favor and against the defendant HYD-MEC GROUP LIMITED, a corporation, in an amount in excess of \$50,000.00, plus costs incurred in the prosecution of this action.

COUNT II - NEGLIGENCE - HYD-MEC GROUP LIMITED

NOW COMES the plaintiff hereto THOMAS LAYBURN, by and through his attorneys, SUSAN E. LOGGANS & ASSOCIATES, P.C., and complaining of the defendant HYD-MEC GROUP LIMITED, a Canadian corporation, upon information and belief, states as follows:

- On and prior to November 21, 2007, defendant HYD-MEC GROUP 1. LIMITED was a corporation authorized to transact business in the State of Illinois and was in the business of designing, manufacturing, distributing, selling and maintaining HYD-MEC H-22A steel cutters.
- On and prior to November 21, 2007, defendant, HYD-MEC GROUP 2. LIMITED, did design, manufacture, distribute, sell and maintain said HYD-MEC H-22A's.
- On November 21, 2007, one of the HYD-MEC H-22A's designed, 3. manufactured, distributed, sold and maintained by defendant HYD-MEC GROUP LIMITED, Model HYD-MEC H-22A was in the possession of CSC and defendant

HYD-MEC GROUP LIMITED transported and placed said HYD-MEC H-22A to CSC, located in Romeoville, Illinois.

- On and prior to November 21, 2007, the plaintiff THOMAS LAYBURN, was an employee of CSC, and worked on a two year-old HYD-MEC H-22A steel cutting machine.
- On November 21, 2007, while the plaintiff THOMAS LAYBURN was 5. in the normal course of his duties and using the aforesaid HYD-MEC H-22A, he was injured.
- At all times relevant hereto, it was the duty of the defendant HYD-MEC 6. GROUP LIMITED to manufacture, design, sell, distribute and maintain said HYD-MEC H-22A in a safe and reasonable manner so as not to cause injury to those utilizing the HYD-MEC H-22A including the plaintiff THOMAS LAYBURN.
- Notwithstanding the aforesaid duty, on and prior to November 21, 2007, 7. the defendant HYD-MEC GROUP LIMITED by and through its duly authorized agents, employees and servants committed one or more of the following negligent acts or omissions:
 - (a) Had insufficient safeguards to prevent users of the HYD-MEC H-22A from turning the switch to the "Close" position for the vise.
 - (b) Did not contain appropriate mechanisms to prevent the switch from automatically shutting when the switch is turned to the "Close" position, causing the vise to instantly shut, when feasible, alternative designs were available.
 - (c) Did not contain appropriate warning signs and instructions for the safe operation and use of the HYD-MEC H-22A; and

Kevin Winter

- (d) Did not contain appropriate mechanisms for stopping the vice when the switch was in the "Close" position as it did for when the switch is in the "Open" position.
- (e) Failed to ensure that the HYD-MEC H-22A was safe for those utilizing it.
- (f) Failed to properly maintain and repair the HYD-MEC H-22A in a safe and reasonable manner, so that users of the HYD-MEC H-22A, including the plaintiff, THOMAS LAYBURN, would not become injured.
- As a proximate result of one or more of the aforesaid negligent acts 8. and/or omissions committed by the defendant HYD-MEC GROUP LIMITED, the plaintiff THOMAS LAYBURN suffered severe and permanent injury of a personal and pecuniary nature.

WHEREFORE the plaintiff THOMAS LAYBURN prays that judgment be entered in his favor and against the defendant HYD-MEC GROUP LIMITED, a corporation, in an amount in excess of \$50,000.00, plus costs incurred in the prosecution of this action.

COUNT III - LOSS OF CONSORTIUM - HYD-MEC GROUP LIMITED

NOW COMES the plaintiff hereto, CINDY LAYBURN, by and through her attorneys SUSAN E. LOGGANS & ASSOCIATES, P.C., and complaining of the defendant HYD-MEC GROUP LIMITED, a corporation, upon information and belief states as follows:

The plaintiff, CINDY LAYBURN, repleads, restates and 1. realleges Paragraphs one (1) through seven (7), inclusive of

- . Count II as and for Paragraphs one (1) through seven (7) of this Count III as though fully stated herein.
- Before, on and after November 21, 2007, CINDY LAYBURN 8. was married to THOMAS LAYBURN.
- As a proximate result of one or more of the foregoing negligent 9. acts or omissions committed by the defendant HYD-MEC GROUP LIMITED, the plaintiff CINDY LAYBURN suffered and will in the future continue to suffer loss of consortium and has been denied the comfort, counsel and society of THOMAS LAYBURN.

WHEREFORE the plaintiff hereto CINDY LAYBURN prays that judgment be entered in her favor and against the defendant, HYD-MEC GROUP LIMITED, a corporation in an amount in excess of \$50,000.00, plus costs incurred in the prosecution of this action.

> SUSAN E. LOGGANS & ASSOCIATES, P.C. Attorneys for Plaintiffs

DEVIN C. MCNULTY

SUSAN E. LOGGANS & ASSOCIATES, P.C. 33 N. LaSalle Street, Suite 1710 Chicago, IL 60602 (312) 201-8600

THOMAS LAYBURN and
CINDY LAYBURN

Plaintiff(s),

vs.

NO.

HYD-MCC GROUP LIMITED

Defendant(s)

- 1. I/We am/are the plaintiff(s) in the above entitled cause of action.
- 2. The total money damages sought in the above cause of action will exceed the amount of \$50,000.

SUBSCRIBED AND SWORN to before me This 9 day of April 2008

NOTARY PUBLIC

SUSAN E. LOGGANS & ASSOCIATES, P.C. 33 North LaSalle Street, Suite 1710 Chicago, IL 60602 312-201-8600 #21683

Official Seal
Jamie Borowski
Notary Public State of Illinois
My Commission Expires 02/27/2012

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2120 - Served 2220 - Not Served 2320 - Served By Mail

2420 - Served By Publication

SUMMONS

2121 - Served

2221 - Not Served 2321 - Served By Mail

2421 - Served By Publication

ALIAS - SUMMONS

(Rev.12/3/01) CCG 000:

U District 4 - Maywood

1500 Maybrook Ave.

Maywood, IL 60153

IN THE CIRCUIT COURT	OF COOK COUNTY,	ILLINOIS
COUNTY DEPARTMENT,	LAW	DIVISION
• · · · · · · · · · · · · · · · · · · ·		

THOMAS LAYBURN and CINDY LAYBURN

Plaintiff's

₩.

HYD-MEC GROUP LIMITED

Defendant.

2008L003888

CAJ_ENDAR/ROON B

TIME 00=00

PLYASEDSERVE.Li=bility

Kevin Winter

291 West Grant Street

St. Anne, IL 60964

SUMMONS

To each defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which i hereto attached, or otherwise file your appearance, and pay the required fee, in the office of the Clerk of this Court: the following location:

- Richard J. Daley Center, 50 W. Washington, Room 801, Chicago, Illinois 60602
- District 2 Skokie 5600 Old Orchard Rd. Skokie, IL 60077
- District 5 Bridgeview 10220 S. 76th Ave. Bridgeview, IL 60455
- ☐ District 3 Rolling Meadows 2121 Euclid Rolling Meadows, IL 60008
- District 6 Markham 16501 S. Kedzie Pkwy. Markham. IL 60426

You must file within 30 days after service of this summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIE! REQUESTED IN THE COMPLAINT.

To the officer:

This summons must be returned by the officer or other person to whom it was given for service, wit endorsement of service and fees, if any, immediately after service. If service cannot be made, this summons shabe returned so endorsed. This summons may not be served later than 30 days after its date.

Atty. No.:	216	83		W
Name:	SUSAN	E.	LOGGANS & ASSOCIATES	-
Atty.for:		 .	PLAINTIFF	•
Address:	33	N.	LASALLE, SUITE 1710	
City/State/Zip	»		CHICAGO, IL 60602	Da
Telephone:			312-201-8600	(1

WITNESS.

Herk of Court

4 - 21-08

Date of service:

(To be inserted by officer on copy left with defendant or other person)

Service by Facsimile Transmission will be accepted at:_

(Area Code) (Facsimile Tele

JUDGE ANDERSEN

MAGISTRATE JUDGE SCHENKIER

SEL/DCM/kkm	07-201	•	04/09/08	#21	683
STATE OF ILLINOIS)) SS.				
COUNTY OF COOK)				
IN THE CIRC COUR	CUIT COU	RT (OF COOK (MENT, LAV	COUNT V DIVI	Y, ILLINOIS SION
THOMAS LAYBURN as CINDY LAYBURN,	ıd)		.`. ;*
Plaintiffs,)) Ca	se No.	2008L003888 CALENDAR/ROOM B TIME 00:00
HYD-MEC GROUP LIN	AITED,)		Product Liability
Def	endant.		ć	:	

COMPLAINT AT LAW

COUNT I - STRICT LIABILITY IN TORT - HYD-MEC GROUP LIMITED

NOW COMES the plaintiff hereto, THOMAS LAYBURN, by and through his attorneys SUSAN E. LOGGANS & ASSOCIATES, P.C., complaining of the defendant HYD-MEC GROUP LIMITED, a Canadian corporation, upon information and belief states as follows:

- 1. On and prior to November 21, 2007, defendant HYD-MEC GROUP

 LIMITED was a corporation authorized to transact business in the State of Illinois and specializes in manufacturing and servicing large sawing machines.
- On and prior to November 21, 2007, defendant HYD-MEC GROUP
 LIMITED did design, manufacture, sell, distribute and maintain specialty steel cutters.
- 3. On November 21, 2007, one of the steel cutting machines designed, manufactured, distributed, maintained and/or sold by the defendant HYD-MEC



GROUP LIMITED, model HYD-MEC H-22A, was in possession of Crucible Service Centers (CSC), in the City of Romeoville, County of Will, State of Illinois.

- 4. On and prior to November 21, 2007, the plaintiff, THOMAS

 LAYBURN, was an employee of CSC, and was required to cut large and small diameters into steel plates using the HYD-MEC H-22A. CSC bought the HYD-MEC H-22A steel cutter used by the plaintiff directly from HYD-MEC Group Limited.
- 5. On November 21, 2007, while the plaintiff THOMAS LAYBURN was in the normal course of his duties and was utilizing the aforesaid HYD-MEC H-22A, he was injured.
- 6. Prior to November 21, 2007, at the time the HYD-MEC H-22A left the control of defendant HYD-MEC GROUP LIMITED, it was in a condition that was unreasonably dangerous in one or more of the following ways:
 - (a) Had insufficient safeguards to prevent users of the HYD-MEC H-22A from turning the switch to the "Close" position for the vise.
 - (b) Did not contain appropriate mechanisms to prevent the switch from automatically shutting when the switch is turned to the "Close" position, causing the vise to instantly shut, when feasible, alternative designs were available.
 - (c) Did not contain appropriate warning signs and instructions for the safe operation and use of the HYD-MEC H-22A; and
 - (d) Did not contain appropriate mechanisms for stopping the vice when the switch was in the "Close" position as it did for when the switch is in the "Open" position.

7. As a proximate result of one or more of the aforesaid unreasonably dangerous conditions of the aforesaid HYD-MEC H-22A, the plaintiff, THOMAS LAYBURN, suffered severe and permanent injury of a personal and pecuniary nature.

WHEREFORE the plaintiff, THOMAS LAYBURN, prays that judgment be entered in his favor and against the defendant HYD-MEC GROUP LIMITED, a corporation, in an amount in excess of \$50,000.00, plus costs incurred in the prosecution of this action.

COUNT II - NEGLIGENCE - HYD-MEC GROUP LIMITED

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- 2. On and prior to November 21, 2007, defendant, HYD-MEC GROUP LIMITED, did design, manufacture, distribute, sell and maintain said HYD-MEC H-22A's.
- 3. On November 21, 2007, one of the HYD-MEC H-22A's designed, manufactured, distributed, sold and maintained by defendant HYD-MEC GROUP LIMITED, Model HYD-MEC H-22A was in the possession of CSC and defendant

Case 1:08-cv-02876

Filed 05/16/2008 Page 4 of 8 p.5

HYD-MEC GROUP LIMITED transported and placed said HYD-MEC H-22A to CSC, located in Romeoville, Illinois.

- On and prior to November 21, 2007, the plaintiff THOMAS LAYBURN, was an employee of CSC, and worked on a two year-old HYD-MEC H-22A steel cutting machine.
- On November 21, 2007, while the plaintiff THOMAS LAYBURN was 5. in the normal course of his duties and using the aforesaid HYD-MEC H-22A, he was injured.
- At all times relevant hereto, it was the duty of the defendant HYD-MEC 6. GROUP LIMITED to manufacture, design, sell, distribute and maintain said HYD-MEC H-22A in a safe and reasonable manner so as not to cause injury to those utilizing the HYD-MEC H-22A including the plaintiff THOMAS LAYBURN.
- Notwithstanding the aforesaid duty, on and prior to November 21, 2007, 7. the defendant HYD-MEC GROUP LIMITED by and through its duly authorized agents, employees and servants committed one or more of the following negligent acts or omissions:
 - (a) Had insufficient safeguards to prevent users of the HYD-MEC H-22A from turning the switch to the "Close" position for the vise.
 - (b) Did not contain appropriate mechanisms to prevent the switch from automatically shutting when the switch is turned to the "Close" position, causing the vise to instantly shut, when feasible, alternative designs were available.
 - (c) Did not contain appropriate warning signs and instructions for the safe operation and use of the HYD-MEC H-22A; and

- (d) Did not contain appropriate mechanisms for stopping the vice when the switch was in the "Close" position as it did for when the switch is in the "Open" position.
- (e) Failed to ensure that the HYD-MEC H-22A was safe for those utilizing it.
- (f) Failed to properly maintain and repair the HYD-MEC H-22A in a safe and reasonable manner, so that users of the HYD-MEC H-22A, including the plaintiff, THOMAS LAYBURN, would not become injured.
- As a proximate result of one or more of the aforesaid negligent acts 8. and/or omissions committed by the defendant HYD-MEC GROUP LIMITED, the plaintiff THOMAS LAYBURN suffered severe and permanent injury of a personal and pecuniary nature.

WHEREFORE the plaintiff THOMAS LAYBURN prays that judgment be entered in his favor and against the defendant HYD-MEC GROUP LIMITED, a corporation, in an amount in excess of \$50,000.00, plus costs incurred in the prosecution of this action.

COUNT III - LOSS OF CONSORTIUM - HYD-MEC GROUP LIMITED

NOW COMES the plaintiff hereto, CINDY LAYBURN, by and through her attorneys SUSAN E. LOGGANS & ASSOCIATES, P.C., and complaining of the defendant HYD-MEC GROUP LIMITED, a corporation, upon information and belief states as follows:

The plaintiff, CINDY LAYBURN, repleads, restates and 1. realleges Paragraphs one (1) through seven (7), inclusive of

- . Count II as and for Paragraphs one (1) through seven (7) of this Count III as though fully stated herein.
- Before, on and after November 21, 2007, CINDY LAYBURN 8. was married to THOMAS LAYBURN.
- As a proximate result of one or more of the foregoing negligent 9. acts or omissions committed by the defendant HYD-MEC GROUP LIMITED, the plaintiff CINDY LAYBURN suffered and will in the future continue to suffer loss of consortium and has been denied the comfort, counsel and society of THOMAS LAYBURN.

WHEREFORE the plaintiff hereto CINDY LAYBURN prays that judgment be entered in her favor and against the defendant, HYD-MEC GROUP LIMITED, a corporation in an amount in excess of \$50,000.00, plus costs incurred in the prosecution of this action.

> SUSAN E. LOGGANS & ASSOCIATES, P.C. Attorneys for Plaintiffs

DEVIN C. MCNULTY

SUSAN E. LOGGANS & ASSOCIATES, P.C. 33 N. LaSalle Street, Suite 1710 Chicago, IL 60602 (312) 201-8600

- 1. I/We am/are the plaintiff(s) in the above entitled cause of action.
- 2. The total money damages sought in the above cause of action will exceed the amount of \$50,000.

SUBSCRIBED AND SWORN to before me This 9 day of April , 2008

NOTARY PUBLIC

SUSAN E. LOGGANS & ASSOCIATES, P.C. 33 North LaSalle Street, Suite 1710 Chicago, IL 60602 312-201-8600 #21683

Official Seal
Jamle Borowski
Notary Public State of litinois
My Commission Expires 02/27/2012

2120 - Served

2220 - Not Served 2320 - Served By Mail

2420 - Served By Publication

SUMMONS

2121 - Served

2221 - Not Served 2321 - Served By Mail

2421 - Served By Publication

ALIAS - SUMMONS

(Rev.12/3/01) CCG 000:

1500 Maybrook Ave.

Maywood, IL 60153

IN THE CIRCUIT COURT	OF COOK COUNTY,	ILLINOIS
COUNTY DEPARTMENT,	LAW	DIVISION

THOMAS LAYBURN and CINDY LAYBURN

Plaintiff's

HYD-MEC GROUP LIMITED

Defendant.

2008L003888 DALENDAR/ROOM B PEKSEDSETE, Liability

Kevin Winter 291 West Grant Street St. Anne, IL 60964

SUMMONS

To each defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which i hereto attached, or otherwise file your appearance, and pay the required fee, in the office of the Clerk of this Court : the following location:

- Richard J. Daley Center, 50 W. Washington, Room 108 , Chicago, Illinois 60602 U District 4 - Maywood
- ☐ District 2 Skokie . 5600 Old Orchard Rd. Skokle, IL 60077
- ☐ District 5 Bridgeview 10220 S. 76th Ave. Bridgeview, IL 60455
- ☐ District 3 Rolling Meadows 2121 Euclid Rolling Meadows, IL 60008
- District 6 Markham 16501 S. Kedzie Pkwy. Markham, IL 60426

You must file within 30 days after service of this summons, not counting the day of service. IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTEREDAGAINST YOU FOR THE RELIE! REQUESTED IN THE COMPLAINT.

To the officer:

This summons must be returned by the officer or other person to whom it was given for service, wit endorsement of service and fees, if any, immediately after service. If service cannot be made, this summons sha be returned so endorsed. This summons may not be served later than 30 days after its date.

Atty. No.:	21683	· ·
Name:	SUSAN E.	LOGGANS & ASSOCIATES
Atty.for:		PLAINTIFF .
Address:	33 N.	LASALLE, SUITE 1710
City/State/Zip	·	CHICAGO, IL 60602
Telephone:		312-201-8600

Date of service:

(To be inserted by officer on copy left with defendant or other person)

Service by Facsimile Transmission will be accepted at:

(Area Code) (Facsimile Tele